### **REMARKS**

In the Office Action mailed February 21, 2008, the Examiner rejected claims 1, 6, and 8-11 under 35 U.S.C. §102(e) as anticipated by U.S. Patent 6,779,184 to Puri et al. (Puri); rejected claims 1, 3-7, and 11-15 under 35 U.S.C. §102(e) as anticipated by U.S. Patent Publication No. 20050182843 to Reistad et al. (Reistad); and rejected claims 2 under 35 U.S.C. §103(a) as unpatentable over U.S. Patent Publication No. 20030061256 to Mathews et al. (Mathews) in view of Reistad.

By this amendment, Applicants amend claim 2 to further define the features of that claim. Applicants submit that no new matter has been introduced since the claim amendments are supported by the specification (see, e.g., paragraphs 012 and 024).

Claims 1-15 are currently pending.

At the outset, Applicants thank the Examiner for withdrawing the rejection under section 101 as well as withdrawing the Klein and Brouk rejections.

# Rejection of Claims 1, 6, and 8-11 Under 35 U.S.C. § 102(e)

The Examiner rejected claims 1, 6, and 8-11 under 35 U.S.C. §102(e) as anticipated by <u>Puri</u>. Applicants respectfully traverse this rejection.

Claim 1 recites a combination of features including, among other things, "defining a context object for a message, the context object being an abstraction of content of the message, the context object stored in a repository." The Examiner appears to allege that <a href="Puri">Puri</a> discloses this noted feature of claim 1. However, a careful scrutiny of <a href="Puri">Puri</a> reveals that <a href="Puri">Puri</a> teaches away from using the context object as an abstraction of the content of the message. Indeed, <a href="Puri">Puri</a> is replete with examples of using the content of the message rather than the "abstraction," as recited in claim 1. For example, <a href="Puri">Puri</a>

Customer Number: 64280

describes routing messages based on "business information embedded within the distribution messages" rather than use the abstraction of those messages. Specifically, Puri states:

The present invention may also be viewed as a loosely coupled network of applications, comprising an object broker, the object broker receiving and distributing messages over the network; at least one switching means coupled to the object broker, the switching means storing a plurality of rules adapted to respond to business information embedded within the distributed messages and to switch the distributed messages toward selected applications; and a high level application program interface (API) disposed between each switching means and each application coupled to the network, each high level API being configured to transform the switched messages to a format appropriate to the selected applications.

Puri, column 2, lines 25-37 (emphasis added). See, also, Puri at col. 4, lines 33-65.

Moreover, Puri states:

Depending, therefore, upon the type and content of the message forwarded to a particular high level API 104, 114, 118, 124, 128, 134, 138, 144, 148 from one of the switches 102, 112, 122, 132, one or more low level APIs LLAPI 1, LLAPI 2... LLAPI n within an application are called by one or more of the high level APIs 104, 114, 118, 124, 128 . 134 . 138 . 144 . 148.

Puri, col. 7, lines 36-42 (emphasis added). In view of the foregoing, it is clear that Puri does not define a context object being an abstraction of the content of the message. Instead, Puri simply uses the content of information embedded in the message. Because Puri fails to disclose the claimed "context object." Puri fails to disclose at least the following feature of claim 1: "defining a context object for a message, the context object being an abstraction of content of the message, the context object stored in a repository." Therefore, claim 1 is not anticipated by Puri, and the rejection of claim 1 under 35 U.S.C. § 102(e) should be withdrawn.

The Examiner also alleges that <u>Puri</u> at col. 2, lines 20-24 and col. 7, lines 11-29 discloses the following feature of claim 1: "assigning the context object to one or more interfaces through which the message is to be communicated." Office Action, pages 2-3. However, as noted above, <u>Puri</u> does not disclose the claimed "context object." At best, the cited passages of <u>Puri</u> relate to a "business object" described by <u>Puri</u> as "a combination of high level APIs, low level APIs and data stores in each of the applications." Abstract. Thus, <u>Puri</u>'s "business object" cannot possibly constitute the claimed "context object," much less the following feature of claim 1: "assigning the context object to one or more interfaces through which the message is to be communicated." Therefore, claim 1 is not anticipated by <u>Puri</u>, and the rejection of claim 1 under 35 U.S.C. § 102(e) should be withdrawn for this additional reason.

Claims 6 and 11, although of different scope, includes features that are similar to those noted above with respect to claim 1. Claims 8-10 depend from claim 6. For at least the reasons given above with respect to claim 1, independent claims 6 and 11 as well as claims 8-10, at least by reason of their dependency from independent claim 6, are not anticipated by <u>Puri</u>, and the rejection of those claims under 35 U.S.C. § 102(e) should be withdrawn.

# Rejection of Claims 1, 3-7, and 11-15 Under 35 U.S.C. § 102(e)

The Examiner rejected claims 1, 3-7, and 11-15 under 35 U.S.C. §102(e) as anticipated by Reistad. Applicants respectfully traverse this rejection.

The Examiner appears to allege that <u>Reistad</u> at page 3, paragraphs 0023, 0024, and 0029 discloses the following feature of claim 1: "assigning the context object to one or more interfaces through which the message is to be communicated." Office Action,

Customer Number: 64280

page 4. Applicants disagree because, at best, Reistad discloses a "resource identifier" which identifies a resource rather than an abstract description of the message.

Specifically. Reistad states:

[0023] In vet another example, referring to FIGS, 1 and 2, the client manager 12 may send 220 a resource identification message to a resource agent 16 requesting available resources and/or valid operations The resource agent 16 may identify 222 available resources in any suitable manner, such as by accessing the catalog data store 20 which lists available resource identifier. The catalog data store may be any suitable data store such as a database, a virtual catalog, or hard-wired into software code. One suitable method to generate and store the catalog store 20 is discussed in more detail in U.S. patent application Ser. No. 10/692,432 titled USE OF ATTRIBUTION TO DESCRIBE MANAGEMENT INFORMATION, and filed Oct. 23, 2003, and incorporated herein by reference. The resource agent may send 224 a response to the client manager 12 listing available resource identifiers. The system administrator may select a desired resource identifier from the list, and the client manager may automatically generate the required message to be sent to the resource agent and incorporate the selected resource identifier. The resource agent, in response to the identification message, may also list valid operations and/or accessible information for one or more of the listed resources. In this manner, the systems administrator may choose the desired resource identifier by analyzing the accessible information listing and may choose the desired and valid operation to execute against the selected resource identifier. It is to be appreciated that any suitable user interface of the client component may be appropriate to support receiving resource information from the resource agent, selecting a resource identifier and/or operation identifier, and/or generating a request message to be sent to the resource agent.

[0024] Upon receipt of a request message 30 from a client manager requesting an operation against an identified resource 18, the resource agent 16 may resolve 204 the resource identifier into an address for the appropriate local handler 22. The resource agent may use any suitable method or process to resolve the resource identifier into an address for the local handler such as accessing a catalog data store 20 which associates a resource identifier with a local handler address. The catalog data store may be any suitable data store such as a database, a virtual catalog, or hard-wired into software code. The resource agent 16 may then translate 206 the SOAP message 30 into an appropriate format and/or schema compliant with the local handler 22. The resource agent 16 may determine the appropriate schema or message format for the

resolved local handler 22. For example, different local handlers 22 for different resources 18 may require different schemas such as message formats, data fields, parameters, actions, and the like. The resource agent may determine the local handler message schema in any suitable manner such as accessing the catalog data store 20 which may associate the local handler address with a communication schema. Appropriate methods of communicating with local handlers and their schema is discussed further in U.S. patent application Ser. No. 10/692,432 titled USE OF ATTRIBUTION TO DESCRIBE MANAGEMENT INFORMATION, and filed Oct. 23, 2003, and incorporated herein by reference.

Indeed, the <u>Reistad</u>'s resource identifier includes a variety of items, none of which constitute an abstraction of the message, as evident by the following:

The resource identifier may identify the target resource, the item or information to be retrieved, the method being accessed, the table being queried, the event stream to which a subscription applies, and the like.

Reistad, paragraph 0028. Thus, Reistad's "resource identifier" cannot possibly constitute the claimed "context object," much less the following feature of claim 1: "defining a context object for a message, the context object being an abstraction of content of the message, the context object stored in a repository." Therefore, claim 1 is not anticipated by Reistad, and the rejection of claim 1 under 35 U.S.C. § 102(e) should be withdrawn.

Moreover, at paragraph 0029, <u>Reistad</u> discloses that the resource identifier using a CIM class may include a URI (uniform resource identifier). <u>Reistad</u> at paragraph 0031 further elaborates that the URI is a reference to a resource, not an abstract of the content of a message.

The Examiner further alleges that <u>Reistad</u> at paragraphs 0024, 0025, 0027, and 0054 discloses the following feature of claim 1: "assigning the context object to one or more interfaces through which the message is to be communicated." However, because

Reistad does not disclose the "context object" recited in claim 1, Reistad cannot possibly disclose the noted "assigning" feature of claim 1. Moreover, Reistad's resource agent receives a SOAP request message, which includes a resource identifier and action identifier, resolves the request into a local handler 22 address, translates the request, and dispatches the request to the local handler. Reistad, paragraph 054. Thus, Reistad use of a handler to resolve the resource identifier (see Reistad, paragraph 054) does not constitute the noted "assigning" step.

In view of the foregoing, claim 1 is not anticipated by Reistad, and the rejection under 35 U.S.C. § 102(e) of claim 1 and claims 3-5, at least by reason of their dependency from independent claim 1, should be withdrawn for this additional reason.

Claims 6 and 11, although of different scope, includes features that are similar to those noted above with respect to claim 1. Claim 7 depends from claim 6. Claims 12-15 depend from claim 11. For at least the reasons given above with respect to claim 1, independent claims 6 and 11 as well as claims 7 and 12-15, at least by reason of their dependency from independent claims 6 and 11, are not anticipated by <u>Reistad</u>, and the rejection of those claims under 35 U.S.C. § 102(e) should be withdrawn.

# Rejection of Claim 2 Under 35 U.S.C. § 103(a)

The Examiner rejected claim 2 under 35 U.S.C. §103(a) as unpatentable over <u>Mathews</u> in view of <u>Reistad</u>. Applicants respectfully traverse this rejection.

Claim 2, as amended, includes a combination of features including, for example, "defining a context object for a message, the context object being an abstraction of content of the message, the context object, stored in a repository, including criteria to enable reuse across one or more interfaces, the context object providing the criteria for

determining one or more send steps at one of the interfaces," "assigning, to the one or more interfaces through which the message is to be communicated, the context object describing the message," and "accessing, via the context object, the content of the message at one of the interfaces, wherein accessing the content includes accessing application data associated with the context object."

The Examiner alleges that the Transaction Definition (TD) of <u>Mathews</u> constitutes the claimed "context object." Applicants disagree because the TD merely defines a transaction and lacks any of the features of the context object recited in claim 2, as noted below with respect to (1)-(7). Specifically, <u>Mathews</u> defines the TD as follows:

[0025] "TD" means transaction definition. A TD is a quantifiable set of information that defines a transaction to be performed with a system of TPFs and one or more RSPs and RSCs. A TD specifies the nature of the transaction, processing instructions, required conditions, and expected results.

Mathews, paragraph 0025. Although TD defines a transaction, there is absolutely no disclosure or suggestion in Mathews that the TD constitutes a context object, much less a context object having the following features: (1) an abstraction of content of the message, (2) stored in a repository, (3) includes criteria to enable reuse across one or more interfaces, (4) provides the criteria for determining one or more send steps at one of the interfaces, (5) assigned to one or more interfaces through which a message is to be communicated, (6) describes the message, and (7) accessing, via the context object, the content of the message at one of the interfaces.

In view of the foregoing, <u>Mathews</u> fails to disclose or suggest the "defining," 
"assigning," and "accessing" features, as recited in claim 2. Moreover, <u>Reistad</u>, for at 
least the reasons given above with respect to claim 1, also fails to cure the noted

deficiencies of <u>Mathews</u>. Therefore, claim 2 is allowable over <u>Mathews</u> and <u>Reistad</u>, whether taken alone or in combination, and the rejection of claim 2 under 35 U.S.C. §103(a) should be withdrawn.

#### CONCLUSION

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

If there are any questions regarding these amendments and remarks, the Examiner is encouraged to contact the undersigned at the telephone number provided below. No fee is believed to be due, however, the Commissioner is hereby authorized to charge any fees that may be due, or credit any overpayment of same, to Deposit Account No. 50-0311. Reference No. 34874-090/2003P00732US.

Respectfully submitted.

Date: 21 May 2008

Pedro F. Suarez Reg. No. 45.895

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

5355 Mira Sorrento Place,

Suite 600

San Diego, CA 92121 Customer No. 64280

Tel.: 858/320-3040 Fax: 858/320-3001